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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT LITIGATION

Case No. 3:23-md-03084-CRB

Honorable Judge Charles R. Breyer

This Document Relates to:

ALL ACTIONS

DECLARATION OF WILLIAM A. LEVIN IN SUPPORT OF ADMINISTRATIVE MOTION TO PARTIALLY SEAL RESPONSE TO **RACHEL ABRAMS' NOVEMBER 27, 2023 LETTER**

- I, William A. Levin, declare as follows:
- 1. I am an attorney duly licensed to practice law before all courts of the State of California. I am a Founding Partner at the law firm Levin Simes LLP, and counsel of record for all Jane Doe LSA and Jane Doe LS Plaintiffs in 90 actions tagged into the MDL. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.
- 2. This declaration is made in support of Levin Simes Plaintiffs' Administrative Motion to File Partially Under Seal the Response to Rachel Abrams' November 27, 2023 Letter.

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3. The attached letter includes confidential and sensitive information regarding Rachel
Abrams. This information is the subject of a private arbitration between Levin Simes and Pieffer
Wolf and Rachel Abrams, pending before the Hon. Rebecca Westerfield (Ret.). The trial of that
suit is set for April 15, 2024.

- 4. The portions of the document that are redacted include references to statements made by Ms. Abrams under oath in the arbitration that contradict statements made in her November 27, 2023 letter to the Court. The context of the redacted portions are such that they do not bear on any issue other than Mr. Abrams' appointment as co-lead, and are only relevant to her application to the Court.
- 5. As a consequence, due to the confidential and sensitive nature of the redacted portions, we believe it would be best to be viewed only by those who are necessary to resolve this issue --Your Honor, Ms. Abrams, and opposing counsel. However, if Rachel Abrams chooses to share this with other fellow PLG applicants, we would have no objection.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 30, 2023, in San Francisco, California.

> /s/ William A. Levin William A. Levin Attorney for the Doe LS Plaintiffs

San Francisco, California 94111 415.426.3000 phone • 415.426.3001 fax CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ William A. Levin
William A. Levin